

COMMON PLEAS COURT

2024 JUL 19 PM 3:15

FILED  
DAVID B. WADSWORTH  
MEDINA COUNTY  
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS  
MEDINA COUNTY, OHIO

JASMINE COPPOLA  
9514 Overton Road  
Burbank, Ohio 44214

and

WAYNE SIGLER  
9514 Overton Road  
Burbank, Ohio 44214

Plaintiffs,

v.

WILLIAM C. THOMAS  
606 S. John Zink Street  
Skiatook, Oklahoma 74070

and

CONTRACT FREIGHTERS, INC., c/o  
Corporation Service Company, statutory agent  
1160 Dublin Road, Suite 400  
Columbus, Ohio 43215

Defendants.

CASE NO.

JUDGE

2024CIV0623

JOYCE V. KIMBLER, JUDGE

COMPLAINT

Jury Demand Endorsed Hereon

Now comes Plaintiffs, by and through counsel, and state their Complaint against Defendants as follows:

FIRST CAUSE OF ACTION

1. Plaintiffs state that on or about July 22, 2022, Plaintiffs were traveling north in the westerly direction on Interstate 76 in the City of Wadsworth, County of Medina, State of Ohio, when Defendant William C. Thomas ("Defendant Thomas") who was also traveling north in the westerly direction on Interstate 76, veered into the left lane and struck Plaintiffs' vehicle.

DEFENDANT'S  
EXHIBIT

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2. At such time and place, Defendant Thomas negligently operated his vehicle causing it to collide with the vehicle driven by Plaintiffs.

3. Plaintiffs state that as a direct and proximate result of Defendant Thomas' negligence, Plaintiffs suffered damages, and continue to suffer damages, including but not limited to great pain and suffering of mind and body, mental anguish, serious emotional/psychological distress, serious physical injuries which may be permanent in nature, substantial medical expenses, loss of income, among other(s), all to Plaintiffs' damage in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00).

#### **SECOND CAUSE OF ACTION**

4. Plaintiffs reaffirm and reallege all allegations of their Complaint as if fully rewritten herein.

5. At all times relevant hereto, Defendant Thomas was an agent/employee of Defendant Contract Freighters, Inc., and the negligence of Defendant Thomas as alleged in this Complaint is imputed to Defendant Contract Freighters, Inc. under the doctrine of Respondeat Superior.

6. Therefore, as a direct and proximate result of Defendant Thomas' negligence, Defendant Contract Freighters, Inc. is liable to Plaintiffs for damages they have sustained and continue to sustain in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00).

**WHEREFORE**, Plaintiffs demand judgment against the Defendants, jointly and severally, as follows:

I. In favor of Plaintiffs for the damages suffered by them in an amount in excess of Twenty-Five Thousand and 00/100 Dollars (\$25,000.00), plus the costs of this action, pre- and post-judgment interest, and their reasonable attorneys' fees; and

II. For such other and further relief to which Plaintiffs may be entitled, in law or equity.

Respectfully submitted,

HOBSON RASNICK  
FOX & KOLLIGIAN, LLC

By: /s/ Dylan S. Statler

ROBERT R. FOX (#0042179)  
STEVEN R. HOBSON II (#0069010)  
DYLAN S. STATLER (#0100273)  
388 South Main Street, Suite 402  
Akron, OH 44311  
(330) 253-2227  
(330) 253-1261 (fax)  
rfox@neolaw.biz  
shobson@neolaw.biz  
dstatler@neolaw.biz  
*Attorneys for Plaintiffs*

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury.